

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

**IN RE AIR CARGO SHIPPING
SERVICES ANTITRUST LITIGATION
MDL No. 1775**

Master File 06-MD-1775(CBA)(VVP)

ALL CASES

ORAL ARGUMENT REQUESTED

**DECLARATION OF KRISTEN J. MCAHREN IN SUPPORT OF OBJECTIONS OF
DEFENDANT SOUTH AFRICAN AIRWAYS LTD. TO MAGISTRATE JUDGE
POHORELSKY'S SEPTEMBER 17, 2010 ORDER**

KRISTEN J. MCAHREN declares as follows:

1. I am an associate at the law firm of White & Case LLP ("White & Case") and am counsel for Defendant, South African Airways Ltd. ("SAA"), in the above-referenced action;
2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Motion to Compel South African Airways Ltd. to produce Transactional Data and Cost Information located in South Africa and to respond to Plaintiffs' First Set of Interrogatories;
3. Attached hereto as Exhibit 2 is a true and correct copy of South African Airways Ltd.'s Memorandum in Opposition to Plaintiffs' Motion to Compel;
4. Attached hereto as Exhibit 3 is a true and correct copy of Magistrate Judge Viktor V. Pohorelsky's Opinion and Order Granting Motion to Compel;
5. Attached hereto as Exhibit 4 is a true and correct copy of South African Airways Ltd.'s Memorandum in Support of Motion for Reconsideration of the July 23, 2010 Order Directing SAA to Respond to Plaintiffs' Discovery Requests;

6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiffs' Memorandum in Opposition to Defendant South African Airways' Motion for Reconsideration of the July 23, 2010 Order Directing SAA to Respond to Plaintiffs' Discovery Requests;

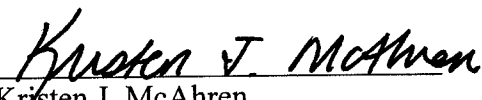
7. Attached hereto as Exhibit 6 is a true and correct copy of South African Airways Ltd.'s Reply in Support of Motion for Reconsideration;

8. Attached hereto as Exhibit 7 is a true and correct copy of the September 15, 2010 Transcript of Status and Scheduling Conference Before the Honorable Magistrate Viktor V. Pohorelsky;

9. Attached hereto as Exhibit 8 is a true and correct copy of Magistrate Judge Viktor V. Pohorelsky's Minute Order for proceedings held before Magistrate Judge Viktor V. Pohorelsky.

I hereby affirm under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Dated: October 8, 2010


Kristen J. McAhren
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